

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

RAPTOR TRADING SYSTEMS, INC.,

No. 16-CV-3430 (RA-DCF)

Plaintiff,

v.

DAVID BETH and MICHAEL WALLACH,

Defendants.

MICHAEL WALLACH and DAVID BETH,

No. 16-CV-5392 (RA-DCF)

Plaintiffs,

v.

THEODOROS LARDOS, MARK HINMAN,
NELSON IGNACIO, and ALEJANDRO GIL,

Defendants.

DECLARATION OF JEFFREY E. GLEN

JEFFREY E. GLEN declares as follows:

1. I am a shareholder at Anderson Kill P.C., attorneys for Raptor Trading Systems, Inc. (“Raptor”), Theodoros Lardos (“Lardos”), Mark Hinman (“Hinman”), Nelson Ignacio (“Ignacio”), and Alejandro Gil (“Gil”) (collectively, the “Raptor Parties”) in the above-referenced actions.

2. I submit this Declaration in support of the Raptor Parties’ Response to Michael Wallach (“Wallach”) and David Beth’s (“Beth”) Objections to Magistrate Judge Freeman’s April 6, 2018 Discovery Order.

3. For ease of reference, "Raptor Action" refers to *Raptor Trading Systems, Inc. v. Beth, et al.*, No. 16-CV-3430 (RA-DCF) and "Wallach-Beth Action" refers to *Wallach, et al., v. Lardos, et al.*, No. 16-CV-5392 (RA-DCF). Raptor is the Plaintiff in the Raptor Action. Lardos, Hinman, Ignacio, and Gil are the Defendants in the Wallach-Beth Action.

4. Attached hereto as Exhibit A is a true and correct copy of the Second Amended Complaint and exhibits that Raptor filed in the Raptor Action.

5. Attached hereto as Exhibit B is a true and correct copy of a May 5, 2017 joint letter to the Court from counsel for the Raptor Parties and counsel for Wallach and Beth, which the parties filed in both of the above-referenced actions and which the Court subsequently memo endorsed on May 8, 2017.

6. Attached hereto as Exhibit C is a true and correct copy of this Court's Amended Order of Reference, dated May 8, 2017, which the Court issued in both of the above-referenced actions.

7. Attached hereto as Exhibit D is a true and correct copy of a letter brief filed by the Raptor Parties on September 29, 2017 in the above-referenced actions.

8. Attached hereto as Exhibit E is a true and correct copy of a letter brief filed by the Raptor Parties on October 11, 2017 in the above-referenced actions.

I declare under penalty of perjury under the laws of the United States of American that the foregoing is true and correct.

Dated: May 14, 2018

/s/ Jeffrey E. Glen

Jeffrey E. Glen